



7171 Oak Ridge Highway Knoxville, Tennessee 37931 865-691-8886 www.gracebc.org

Received & Inspected

JUL 31 2012

FCC Mail Room

Dear Mr. Holdberg,

We have received your letter dated July 3, 2012 requesting information in reference to our petition for exemption from closed captioning rules. In reference to your three requested items, we have attached or provided the following information.

- **Documentation of financial status to demonstrate your inability to afford closed captioning.** Please find attached our budgeted financial statement from our internal records for the month ended June 30, 2012. This represents our financial situation as it stands at the end of the prior fiscal month.
- **Verification that you have sought closed captioning assistance from your programming distributor.** Please find the attached conversation between us and WTNZ of Knoxville about their ability to assist us with these services. Their assistance was limited to supplying us with a vendor who could provide the services at their normal rate of \$100 per hour or petitioning the FCC about the economically burdensome exemption as we had back in 2007. Please see the attached email exchange between myself and the chief engineer at WTNZ, Tom Theilmann.
- **Verification that you have sought additional sponsorship sources or other sources of revenue for captioning.** As referenced in our petition dated January 6, 2012, Grace Baptist is a non-profit organization which relies solely upon the donations of its members. The nature of the programming is religious services held at our location. Seeking sponsorship would run contrary to the nature of said programming and could imply that our programming has a profit-motive. Therefore, we have not sought additional sponsorship for other sources of revenue based upon conscious religious objection.

We greatly appreciate your assistance with our petition. Should you need any additional information, please feel free to reach out to me. We have also attached a copy of your letter dated July 3, 2012.

Sincerely,

Tommy Shaver  
Worship Arts Associate, Grace Baptist Church

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001 Grace Baptist Church

Fiscal Year Beginning 10/1/2011

Budgeted Financial Statement for Period 09 June(\*) 75.00%

Acct #	Description	Actual for Period	Actual YTD	Budget Annual	Var. Actual to Annual Budget %
<b>000 - GENERAL OPERATING</b>					
	<b>Ordinary Revenue / Receipts</b>				
	Total Income	\$369,411.03	\$3,523,762.82	\$4,763,028.00	73.98
<b>110 - Programing</b>					
	Student Ministry Total	\$15,180.26	\$63,725.03	\$55,500.00	114.82
	Children's Ministry Total	\$11,112.49	\$37,493.05	\$67,800.00	55.30
	Preschool Ministries Total	\$1,958.91	\$24,337.70	\$41,500.00	58.65
	Assimilation Total	\$918.59	\$14,001.57	\$18,650.00	75.08
	Worship Totals	\$3,603.15	\$33,152.46	\$82,500.00	40.18
	Audio/Visual Total	\$9,788.69	\$119,467.32	\$126,600.00	94.37
	Media Outreach Totals	\$9,423.93	\$95,597.19	\$142,000.00	67.32
	Media Equipment/Maintenance Totals	\$1,376.54	\$21,453.93	\$49,000.00	43.78
	PROGRAMING TOTAL	\$53,362.56	\$409,228.25	\$583,550.00	70.13
<b>210 - Development</b>					
	Small Groups Total	\$2,018.22	\$20,876.99	\$67,000.00	31.16
	Associate/ Senior Adult Min Total	\$2,388.23	\$8,428.16	\$8,600.00	98.00
	Family Ministries Total	\$6,999.49	\$11,675.23	\$15,400.00	75.81
<b>310 - Development</b>					
	Missions Totals	\$36,296.20	\$339,846.90	\$460,464.00	73.81
	Ministries Total	\$2,578.67	\$33,422.99	\$48,950.00	68.28
	Evangelism Total	\$4,177.05	\$15,439.46	\$12,000.00	128.66
	DEVELOPEMENT TOTAL	\$54,457.86	\$429,689.73	\$612,414.00	70.16
<b>610 - Facilities</b>					
	Facilities Total	\$29,071.48	\$246,356.35	\$332,500.00	74.09
<b>710 - Administration</b>					
	Administration Total	\$10,369.86	\$110,468.54	\$144,300.00	76.55
<b>810 - Infrastructure</b>					
	Infrastructure Total	\$97,216.06	\$533,688.98	\$701,750.00	76.05
	ADMINISTRATION TOTAL	\$136,657.40	\$890,513.87	\$1,178,550.00	75.56
<b>910 - COMPENSATION</b>					
	COMPENSATION SUBTOTAL	\$177,363.88	\$1,799,507.09	\$2,388,514.00	75.34
	TOTAL EXPENSES	\$421,841.70	\$3,528,938.94	\$4,763,028.00	74.09
	TOTAL CONTRIB. OVER/UNDER EXP.	(\$52,430.67)	(\$5,176.12)	\$0.00	0.00

## Jason McCarter

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**To:** Tommy Shaver  
**Subject:** RE: Important Update to Closed Captioning of Church Services

**From:** "Theilmann, Tom" <[ttheilmann@wtnzfox43.com](mailto:ttheilmann@wtnzfox43.com)>  
**Date:** Tue, 15 Nov 2011 13:58:41 -0500  
**To:** Tommy Shaver <[tshaver@gracebc.org](mailto:tshaver@gracebc.org)>  
**Subject:** FW: Important Update to Closed Captioning of Church Services

Hey Tommy,

Here's some information from our corporate legal office that may assist you in re-applying for a closed caption waiver. Let me know if you have additional questions.

In lieu of obtaining a waiver, WTNZ may be able to provide live captioning if desired. I don't have any firm numbers yet, but I'd ballpark the number at \$100 per hour.

Best Regards,

Tom Theilmann  
Chief Engineer  
WTNZ Fox43  
Knoxville, TN  
O 865-684-1280  
C 865-363-2679

**From:** Tygh, Christopher  
**Sent:** Wednesday, November 02, 2011 9:38 AM  
**To:** Tygh, Christopher; All GMs  
**Cc:** Rosser, Jeff; Daugherty, Wayne; Richards, Don; Streit, Brad; Long, Leon; Bryan, Rebecca; Yelverton, Ellenann; Alexander, John  
**Subject:** RE: Important Update to Closed Captioning of Church Services

In case you missed the alert from C&B earlier this week, we now have updated instructions and a waiver request template that churches can use to seek an exemption from the closed captioning requirement based on economic burden. A copy of the instructions and template is attached.

As a reminder, churches who were listed in the FCC's October 20<sup>th</sup> order have **until January 18, 2012** to either caption their programs or file a new waiver request. If a church wants to seek a new waiver, it must follow the attached instructions carefully

and supply all of the needed supporting documentation, including a signed affidavit from the church. The FCC will dismiss incomplete requests.

If you have any questions, please feel free to contact me.

Thanks!

Christopher G. Tygh  
Assistant General Counsel



201 Monroe Street, 20th Floor  
Montgomery, AL 36104  
Direct: (334) 229-0342  
Fax: (334) 223-5542  
[CTygh@RaycomMedia.com](mailto:CTygh@RaycomMedia.com)

**From:** Tygh, Christopher  
**Sent:** Tuesday, October 25, 2011 10:19 AM  
**To:** All GMs  
**Cc:** Rosser, Jeff; Daugherty, Wayne; Richards, Don; Streit, Brad; Long, Leon; Bryan, Rebecca; Yelverton, Ellenann; Alexander, John  
**Subject:** Important Update to Closed Captioning of Church Services

Late last week, the FCC overturned 298 previously granted "economic burden" exemptions from its closed captioning rules. The FCC order affects the churches and organizations listed in the attached PDF document. The listed churches and organizations have 90 days from October 20 (i.e., by January 18, 2012) to either (1) come into full compliance with the FCC's closed captioning requirements, or (2) file a new request for closed captioning exemption under the standards set forth in the FCC's order.

Please review the attached list and confirm whether your station airs any programs or services from the listed churches and organizations. Stations may continue to air programming from the listed churches and organizations that previously has been exempted from closed captioning **until January 18, 2012**. By that deadline, the church must either provide the programming with closed captioning or have filed a new "economic burden" request with the FCC for exemption from the closed captioning requirements. If a church files a new exemption request, its program will be exempt from closed captioning while the request is pending before the FCC.

Please be aware that to meet the new standards for exemption adopted in the FCC's order, a church or organization may approach your station about the cost of providing closed captioning for its programming. Stations may decline requests to close caption programming on behalf of churches and other organizations.

You may recall that several years ago C&B provided a "fill-in-the-blank" request for closed captioning exemption for stations approached by church groups needing assistance in completing the requests. We are in the process of reviewing and updating the model exemption request and will send you an updated version that you can provide to the churches if they request it.

Please call if you have any questions.

Thanks

Christopher G. Tygh  
Assistant General Counsel



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